

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : Case No. 21-12333-ELF  
: **SCOTT A. THOMAS,** :  
: **Debtor** : **Chapter 11**  
: :  
: **Hearing Date: February 16, 2022**  
: **Time: 11:00 a.m.**  
: **Location: Robert N. C. Nix Sr. Federal**  
: **Courthouse, Courtroom #1**  
: **900 Market Street, Suite 400**  
: **Philadelphia, PA 19107**

**NOTICE OF MOTION, RESPONSE**  
**DEADLINE AND HEARING DATE**

To all creditors and parties in interest:

**NOTICE IS GIVEN** that the Debtor has filed a Motion to Dismiss Case Pursuant to 11 U.S.C. §1112(b).

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before January 28, 2022, you or your attorney must do all of the following:

- (a) File an answer explaining your position at the following location:

**Clerk/United States Bankruptcy Court  
900 Market Street, Suite 400  
Philadelphia, PA 19107**

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) Mail a copy to the movant's attorney:

**John R. K. Solt, Esquire  
John R. K. Solt, P.C.  
2045 Westgate Dr., Suite 404B  
Bethlehem, PA 18017  
Phone: 610-865-2465  
Fax: 610-691-2018**

2. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on February 16, 2022, at 11:00 a.m. at the Robert N. C. Nix Sr. Federal Courthouse, 900 Market Street, Courtroom #1, Philadelphia, Pennsylvania 19107. Unless the court orders otherwise, the hearing, on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).
3. If you or your attorney do not take the steps described in paragraphs 1 (a) and 1 (b) above and attend the hearing, the court may cancel the hearing and enter an order granting relief requested in the Motion.
4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1 (b).
5. You may contact the Bankruptcy Clerk's office at (215) 408-2970 to find out whether the hearing has been cancelled because no one filed a response.

**Filing Instructions**

6. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.**
7. **If you are not required to file electronically, you must file your response at:**

**Clerk/United States Bankruptcy Court  
900 Market Street, Suite 400  
Philadelphia, PA 19107**

8. **If you mail your response** to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated in paragraph 2 on the previous page of this Notice.
9. On that same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the Movant's attorney:

**John R. K. Solt, Esquire**  
**John R. K. Solt, P.C.**  
**2045 Westgate Dr., Suite 404B**  
**Bethlehem, PA 18017**  
**Telephone: 610-865-2465**  
**Fax: 610 -691-2018**  
**Email: jsolt.soltlaw@rcn.com**

JOHN R. K. SOLT, P.C.

Dated: 1/ 14 /2022

BY: /s/John R. K. Solt  
John R. K. Solt, Esquire  
2045 Westgate Dr., Suite 404B  
Bethlehem, PA 18017  
ID # 24686  
Phone: (610) 865-2465  
Facsimile: (610) 691-2018  
Attorney for Debtor